

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Cornel West, Melina Abdullah, Geraldine Tunstalle,  
Katherine Hopkins-Bot, and Charles Hier

Plaintiff,

vs.

Pennsylvania Department of State and Al Schmidt, in  
his capacity as Secretary of the Commonwealth

Defendants.

2:24-cv-01349

Judge J. Nicholas Ranjan

**Fed. R. Civ. P. 26(f) REPORT OF THE PARTIES**

**1. Subjects of Fact Discovery:**

The parties anticipate paper discovery and a handful of depositions regarding these general areas of inquiry: (1) The Department of State's (Department) past and present interpretations and enforcement of 25 P.S. § 2911; (2) the development of the Department's 2024 interpretation of 25 P.S. § 2911; (3) the burden on Plaintiffs to comply with 25 P.S. § 2911 and the Department's interpretation of the same; (4) facts related to submission of Cornel West's nomination papers; (5) Cornel West's identification of presidential electors in Pennsylvania and other states and difficulties associated with identifying and maintaining electors; (6) the Department's interpretation and requirements for major political party presidential candidates and presidential electors; (7) the role of presidential electors.

**2. Subjects of Expert Discovery:**

At this time, the parties do not anticipate expert discovery.

**3. Can fact and expert discovery occur at the same time? Why/why not?**

Although the parties do not currently anticipate expert discovery, they agree that expert discovery can occur at the same time as fact discovery if the need for expert discovery arises.

**4. Pre-trial Deadlines:**

a. Date for Initial Disclosures: 2/5/2025

- b. Date for joinder/amendment: 2/7/2025
- c. Date for close of fact discovery: 8/4/2025
- d. Date for close of expert discovery, if bifurcated: 8/4/2025

**5. Do the parties want a Rule 502 non-waiver order - Yes or No?**

No

**6. Are there any ESI issues to address? If yes, please explain:**

The parties do not anticipate any ESI issues.

**7. Protective Order - Yes or No? If yes, please explain:**

The parties do not require a protective order.

Respectfully submitted,

/s/Stephen R. Kovatis

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/s/ Matthew H. Haverstick

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\*pro hac vice application pending